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Attorneys for Plaintiffs
Service Employees International Union
and 100 Oak Street Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

)	CASE NO. C-05 04189 JL
Service Employees)	
International Union and)	STIPULATION TO CONTINUE
100 Oak Street Corporation,)	HEARING ON SUMMARY JUDGEMENT
)	MOTION AND Proposed ORDER
Plaintiffs,)	THEREON
)	
v.)	
)	
United States of America by)	
and through the Commissioner)	
of Internal Revenue Service,)	Hearing : January 17, 2007
)	Time : 9:30 A.M.
Defendant.)	Courtroom: F, 15 th Floor
)	

IT IS HEREBY STIPULATED AND REQUESTED by and between the parties to this action, as reflected by the signatures of their respective counsel appearing below, that the hearing on summary judgement motion set for January 17, 2007, at 9:30 A.M., be continued to January 31, 2007, at 9:30 A.M., or to such other date as the court deems appropriate, and that all related filing deadlines be continued for the same period of two calendar weeks, or to such other dates as the court deems appropriate.

1 On December 13, 2006, Plaintiffs timely filed their motion
 2 for summary judgment. On December 14, 2006, counsel for both
 3 parties discussed continuation of the hearing for two calendar
 4 weeks to give Defendant's counsel sufficient time to file its
 5 reply. Further, counsel for Plaintiffs will be attending the
 6 annual ABA meetings in Florida from January 17, 2007 through
 7 January 21, 2007.

8 The parties agree that a continuation of the hearing on
 9 summary judgment motion, and a continuation of all related filing
 10 deadlines, for a period of two calendar weeks will facilitate the
 11 orderly adjudication of this matter, and that such a continuation
 12 will result in an efficient utilization of the resources of the
 13 court. Such a continuation is in the best interests of the
 14 parties. Accordingly, the parties respectfully request that the
 15 hearing on summary judgment motion, and all related filing
 16 deadlines, be continued for a period of two calendar weeks, or
 17 for such other period of time as the court deems appropriate.

18 Respectfully submitted,

19 Dated: December 21, 2006

TAGGART & HAWKINS

20 /S/ William E. Taggart, Jr.

21 William E. Taggart, Jr.

22 TAGGART & HAWKINS

23 Attorneys for Plaintiffs

SERVICE EMPLOYEES INTERNATIONAL

UNION & 100 OAK STREET CORPORATION

24 Dated: December 18, 2006

KEVIN V. RYAN

25 United States Attorney

26 /S/ David L. Denier

27 David L. Denier

Asst. United States Attorney

28 Tax Division

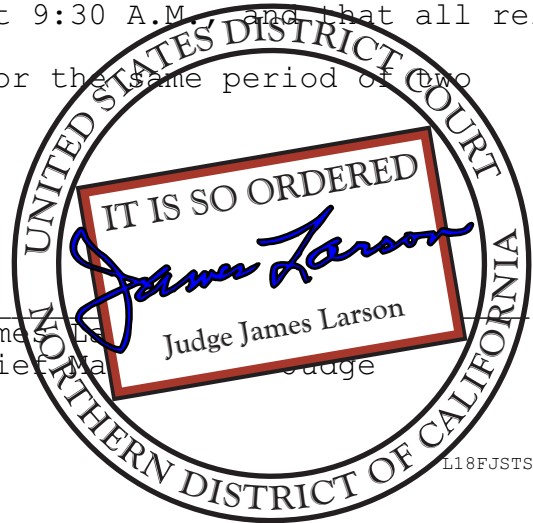
[Proposed] ORDER

Pursuant to the stipulation of the parties as set forth above, and for good cause shown,

IT IS HEREBY ORDERED that the hearing on summary judgment motion currently set for January 17, 2007, at 9:30 A.M., be continued to January 31, 2007, at 9:30 A.M., and that all related filing deadlines, be continued for the same period of two calendar weeks.

Dated: January 8, 2007

James M. Larson
Chief Magistrate Judge



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